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Briefing Paper for HQ Regional Administrator – December 2013
ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE
Kalamazoo, Michigan

SITE SUMMARY:

- The Allied Paper/Portage Creek/Kalamazoo River Superfund site was listed on the NPL in August 1990 and consists of four disposal areas, five former paper mill properties, approximately 77 miles of the Kalamazoo River from Morrow Lake dam to Lake Michigan, and a three-mile stretch of Portage Creek, all contaminated with polychlorinated biphenyls (PCBs). The Allied Paper Landfill is located in Kalamazoo, Michigan, while the larger NPL site spans Calhoun, Kalamazoo, and Allegan Counties in Michigan.
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- The site is primarily contaminated with PCBs primarily from former paper mills, although other former industrial operations also used PCBs along the Kalamazoo River which. The former paper mills recycled carbonless copy waste paper which that contained PCBs, and the wastewater was discharged to the Kalamazoo River, and other processed residuals were placed into on-site lagoons or into disposal areas which later became known as the landfill (Operable Units) (OUs).
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CURRENT STATUS:**ALLIED PAPER LANDFILL (OU 1):**

- During the summer of 2013, EPA led four different tours of the Allied Paper Landfill for interested stakeholder groups such as local officials and neighborhood groups.
- EPA will release the feasibility study (FS) for the Allied Paper Landfill by early January 2014. The FS evaluates protective cleanup alternatives ranging from consolidation and capping (\$41M-million) to complete removal (\$189M-million). EPA will hold public availability sessions in February and March 2014 to discuss the potential cleanup alternatives. EPA does not yet know when it will issue a proposed cleanup plan for public comment, but such a plan could be issued as early as spring 2014. All of the alternatives (except No Action) in the draft FS meet the threshold criteria of protectiveness and compliance with ARARs.
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- The City of Kalamazoo and most citizen groups insist that complete removal of the waste is the only acceptable alternative and will fight any alternative that would leave waste in place, citing threats to the city drinking water and the hazards posed by a landfill adjacent to residential areas that are Environmental Justice communities. The Remedial Investigation report for the Allied Paper Landfill shows Studies show that groundwater at the landfill is not impacting the City's municipal city well field.
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- ◆ During the summer of 2013, EPA conducted four tours/question and answer sessions for interested stakeholder groups (local officials and neighborhood groups).
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- ◆ Region 5 anticipates issuing a proposed plan for public comment during the spring 2014.
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KALAMAZOO RIVER (OU 5):

- ◆ The Kalamazoo River is divided into seven areas each separated by dams. Remedial investigation and feasibility study (RI/FS) ~~Each of these areas requires a separate remedy. Although EPA is conducting investigation work is being conducted from upstream to downstream, with concurrent activities are ongoing underway in four River areas. The FS is being finalized for~~ In Area 1, the 21-mile section ~~segment~~ from Morrow Dam to the former Plainwell Dam, and evaluates potential cleanup options for contamination that was not addressed by prior removal actions EPA and the PRPs are finalizing the Feasibility Study which evaluates an array of cleanup alternatives. Although three Removal Actions have been completed Area 1 there is additional contamination that needs to be addressed. Investigation work is ongoing in downstream Areas 2, 3, and 4 EPA has either completed all sampling to define the nature and extent of contamination or is in the process of collecting samples to support future remedy decisions.
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- ◆ In July 2011, EPA issued an Action Memorandum ~~to complete~~ for a time-critical removal action along a 1.8-mile stretch of Portage Creek located in Area 1, in a 1.8-mile stretch immediately downstream of OU1 to the confluence of the Kalamazoo River. The removal work began in September 2011 and was completed in November 2013. *[See separate Portage Creek information.]* Approximately 23,700 cubic yards of contaminated soil and sediment were removed by this action.
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OTHER LANDFILLS (OU2, OU3 and OU4):

- ◆ Consolidation and capping ~~remedies with groundwater monitoring remedies have been selected for all of these three landfills. The remedies are complete~~ have been successfully implemented at OU3 and OU4, and the construction work at OU2 will be completed in spring 2014. The cap is being completed and the groundwater monitoring system is being installed at OU2 to be completed in the spring 2013.
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- ◆ Since the remedies have been implemented at these landfills PCBS have never been detected above applicable screening levels.
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PAPER MILL PROPERTIES:

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- The former Plainwell Paper Mill is located in the City of Plainwell, Michigan. The 34-acre mill property is bordered by the Kalamazoo River to the north, and surrounded by the Plainwell central business district, and residential and commercial properties. EPA is working with the PRPs and the City of Plainwell to clean up this 34-acre mill property for future use by the City. EPA is currently reviewing the FFS feasibility study which evaluates the array of alternatives, and anticipates making a remedy decision selecting a remedy in fall 2014 in spring 2015. No other mill properties have active work ongoing.

BACKGROUND:

- Primary risks associated with the site are from human consumption of PCB-contaminated fish due to that are contaminated through bioaccumulation, as a result of erosion and runoff of PCB-contaminated soil and sediment in Portage Creek and the Kalamazoo River.
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- Six former hydroelectric dams are also located within the Superfund Site on the river within the site boundaries. In the 1970s, the State of Michigan partially dismantled its three dams (Plainwell, Otsego, and Otsego City). This dropped the River water level and the contaminated sediment that was once under water became exposed on the riverbanks and floodplain areas behind the state-owned dams. EPA and MDEQ currently estimate that there are the Site contains approximately 113,000 lbs of PCBs in the river sediment and floodplain soil.
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- EPA conducted a time-critical removal action in 1998-1999 at the former Bryant Mill Pond (a former impounded section of Portage Creek adjacent to the Allied Paper Landfill property) and consolidated the soils and sediments in the main body of the Allied Paper Landfill landfill. The removal action addressed one of the largest sources of PCBs to the creek and River.
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- In 2007, EPA signed an administrative order on consent (an AOC) was signed between with Georgia-Pacific LLC, Millennium Holdings LLC, and MDEQ and EPA to implement a time-critical removal action in the Plainwell dam area of the Kalamazoo River in OU5 river. Work began in March 2007 and was completed in June 2009, and a total of 130,000 cubic yards of contaminated sediment and soil were removed by this action.
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- In 2007, EPA signed another AOC was signed between with Georgia-Pacific LLC, and Millennium Holdings LLC and EPA to conduct a Supplemental RI/FS for all seven areas of OU5. Each area requires a separate RI/FS and remedy decision, which includes the Kalamazoo River and Portage Creek from Morrow Dam to the confluence of Lake Michigan. OU5 consists of seven discrete areas, each requiring its own remedy.
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- In June 2009, Georgia-Pacific LLC and EPA entered into an AOC to conduct a time-critical

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removal action in the Plainwell ~~2-Ddam #2~~ area of ~~OU5~~the river. ~~This removal project~~Work began in August 2009 and was completed in December 2010, ~~and~~ ~~—~~Approximately 18,000 cubic yards of soil and debris were removed ~~by this action~~.

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- In 2009, Lyondell, the parent company of Millennium Holdings (the largest PRP for the site), filed for bankruptcy. The United States entered into a bankruptcy settlement agreement with Lyondell whereby approximately \$50M, ~~950,000~~ was deposited into a Custodial Trust Response Cost Account for environmental actions for the Allied Paper Landfill property, and another \$50M ~~million~~ was placed in a site-wide special account. This amount was significantly less than the court-approved claim of more than \$900 million. The funds in the Custodial Trust Response Cost Account, if not spent, can be transferred to the site-wide special account for use elsewhere at the site.

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- Cleanup costs for the entire site could reach \$1 billion. Although other PRPs exist, site-wide cleanup costs will likely far exceed their available resources. EPA continues to move forward with cleanup and evaluate creative solutions to solve the environmental problems at this site.

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